

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118


1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0884

DIRECT EMAIL jdabbs@kaplanhecker.com

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 06/02/22

June 1, 2022

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The status conference scheduled for June 2, 2022 is hereby adjourned to June 23, 2022 at 10:30 a.m. The adjournment is necessary to permit the Defense to complete their pretrial motion filings in this matter. The Court finds that the ends of justice served by granting a continuance outweigh the best interests of the public and the defendant in a speedy trial. Accordingly, it is further ordered that the time between June 2, 2022 and June 23, 2022 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice.

Re: *United States v. Lesane*, No. 1:22-cr-00110-VSB

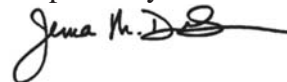
Dear Judge Broderick:

On behalf of our client, Eric Lesane, we respectfully write to request a brief adjournment to the current motion schedule. Pursuant to the current scheduling order, Mr. Lesane's reply in support of his pre-trial motion is due today, June 1, 2022 (ECF 18), and a conference with the Court is scheduled for tomorrow, June 2 (ECF 23). We have met with Mr. Lesane, in person and by telephone, several times in connection with the motion we filed on his behalf, and the government's opposition filed last Wednesday. After a discussion with Mr. Lesane earlier today at the MDC, we would like the opportunity to conduct some additional investigation before submitting our reply on his behalf.

Accordingly, we respectfully request that the deadline for Mr. Lesane's reply be adjourned by nine days, to next Friday, June 10. The parties have conferred, and the government consents to the requested adjournment. Given the requested adjournment, while we are of course happy to appear for the conference scheduled for tomorrow, the parties are also amenable to adjourning the June 2 conference date to a date following the filing of Mr. Lesane's reply, after which the motion will be fully submitted. If the Court agrees, the parties request that the June 2 conference also be adjourned to a time convenient for the Court on June 13, June 14, or June 16.

This is the second such request for adjournment as to the motion deadlines, and the first such request as to the conference. We appreciate the Court's consideration.

Respectfully submitted,



Jenna M. Dabbs

Counsel for Eric Lesane

cc: AUSA Elizabeth Espinosa (via ECF)